

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>FEDERATION OF PHYSICIANS AND DENTISTS,</b>	:
	:
	:
<b>Plaintiff,</b>	:
	:
	:
<b>v.</b>	<b>: Civ. Action No. 02-CV-4039 (PBT)</b>
	:
<b>JOHN F. KENNEDY MEMORIAL HOSPITAL</b>	:
	:
	:
<b>Defendant.</b>	:

**MOTION TO VACATE ORDER DISMISSING CASE  
PURSUANT TO RULE 41.1(b)**

AND NOW comes Plaintiff Federation of Physicians and Dentists (the "Union"), and moves the court to vacate and strike from the record its Order dated April 26, 2004, dismissing this case with prejudice pursuant to Local Rule of Civil Procedure 41.1(b).

WHEREFORE, the Union respectfully requests that the Court issue an order vacating and striking from the record the Order dismissing this action, and compelling J.F.K. Memorial Hospital to pay \$10,000.00 in satisfaction of the parties' settlement agreement and to comply with the remaining terms of the agreement.

Respectfully submitted,

By \_\_\_\_\_  
LANCE GEREN  
PA Attorney I.D. No. 86064  
Validation of Signature Code: lmg61  
FREEDMAN AND LORRY, P.C.  
400 Market Street, Suite 900  
Philadelphia, Pennsylvania 19106  
(215) 931-2573

Dated: July 16, 2004

Attorneys for Plaintiff Federation of Physicians  
and Dentists